

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**HARTFORD FIRE INSURANCE COMPANY,**

**Plaintiff,**

**v.**

**Cause No. 1:13-cv-00896-LFG-RHS**

**JUSTINA ROMERO, individually and as Personal Representative of the ESTATE OF KAYLA ALEXIS MARTINEZ, FRED SANCHEZ, individually and as Personal Representative of the ESTATE OF ALEANDRA SANCHEZ; REYES RUBIO; ANGEL GOMEZ, as Parents and next friend of BRIANNA SANCHEZ, a minor; FELICITA ESQUIBEL, as Parent and next friend of KAYLA ESQUIBEL, a minor; MARY HELEN LUCERO, as Parent and next friend of ALEXANDRIA DE LA O, a minor; and JOSEPH MARTINEZ,**

**Defendants.**

**DEFENDANT FRED SANCHEZ' ANSWER TO  
PLAINTIFF HARTFORD FIRE INSURANCE COMPANY'S  
COMPLAINT FOR INTERPLEADER**

COMES NOW Fred Sanchez, individually and as Personal Representative of the Estate of Aleandra Sanchez by his attorneys of record, Prince, Schmidt, Korte & Baca, LLP (Vitalia M. Sena-Baca) and for his answer to Plaintiff Hartford Insurance Company's Complaint For Interpleader (hereinafter "Complaint") states as follows:

(1) Defendant Fred Sanchez (*hereinafter* Defendant Sanchez) admits the allegations contained in paragraphs 3, 9, 10, 11, 13, 14, 15, 17, 26 and 50 of the Complaint.

(2) Defendant Sanchez is without sufficient information to admit or deny the allegations contained in paragraphs 1, 2, 4, 5, 6, 7, 8, 16, 18, 19, 20, 21, 22, 23, 24, and 25 of the Complaint.

(3) Paragraphs 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 47, 48, 49, 51, 52 and 53 of the Complaint contain statements by Plaintiff which do not require a response.

WHEREFORE Defendant Sanchez on behalf of the Estate of Aleandra Sanchez respectfully requests that the Court determine that the Estate of Aleandra Sanchez receive \$50,000.00 under the liability portion of Plaintiff's policy, \$50,000.00 under the uninsured motorist portion of Plaintiff's policy and \$25,000.00 under the medical payments coverage portion of the policy.

PRINCE, SCHMIDT, KORTE & BACA, LLP

By: /s/ Vitalia M. Sena-Baca, Attorney at Law  
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*Counsel for Fred Sanchez as Personal  
Representative of the Estate of  
Aleandra Sanchez*

CERTIFICATE OF SERVICE

I hereby certify that on the 25<sup>th</sup> day of September, 2013, a true and correct copy of the foregoing document was electronically filed through the CM/ECF system, which caused the following participating CM/ECF counsel to be served with same by electronic means. The undersigned further certified that a true and correct copy of the foregoing was also served via regular U.S. Mail to the following:

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By: /s/ Vitalia M. Sena-Baca, Attorney at Law  
Vitalia M. Sena-Baca